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*Special Counsel for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant,

In re:

BERNARD L. MADOFF,

Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation
(Substantively Consolidated)

IRVING H. PICARD, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and Bernard L. Madoff,

Plaintiff,

v.

SOCIETE GENERALE PRIVATE BANKING
(SUISSE) S.A. (f/k/a SG Private Banking Suisse
S.A.); SOCIETE GENERALE PRIVATE
BANKING (LUGANO-SVIZZERA) S.A. (f/k/a
SG Private Banking (Lugano-Svizzera) S.A.);
SOCGEN NOMINEES (UK) LIMITED;
LYXOR ASSET MANAGEMENT S.A., as

Adv. Pro. No. 12-01677 (SMB)

Successor in Interest to Barep Asset Management S.A.; SOCIETE GENERALE HOLDING DE PARTICIPATIONS S.A., as Successor in Interest to Barep Asset Management S.A.; SG AM AI PREMIUM FUND L.P. (f/k/a SG AM Alternative Diversified U.S. L.P.); LYXOR ASSET MANAGEMENT INC. (f/k/a SGAM Asset Management, Inc.), as General Partner of SG AM AI Premium Fund L.P.; SG AUDACE ALTERNATIF (f/k/a SGAM AI Audace Alternatif); SGAM AI EQUILIBRIUM FUND (f/k/a SGAM Alternative Multi Manager Diversified Fund); LYXOR PREMIUM FUND (f/k/a SGAM Alternative Diversified Premium Fund); SOCIETE GENERALE S.A., as Trustee for Lyxor Premium Fund; SOCIETE GENERALE BANK & TRUST S.A.; OFI MGA ALPHA PALMARES (f/k/a Oval Alpha Palmares); OVAL PALMARES EUROPLUS; UMR SELECT ALTERNATIF; and BANK AUDI S.A.M.- AUDI SARADAR GROUP (f/k/a Dresdner Bank Monaco S.A.M.);

Defendants.

STIPULATION EXTENDING TIME TO RESPOND

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned herein, that the date before which Defendants Societe Generale Private Banking (Suisse) S.A. (f/k/a SG Private Banking Suisse S.A.); Societe Generale Private Banking (Lugano-Svizzera) S.A. (f/k/a SG Private Banking (Lugano-Svizzera) S.A.); Socgen Nominees (UK) Limited; Lyxor Asset Management S.A., as successor in interest to Barep Asset Management S.A. (“Barep”); Societe Generale Holding de Participations S.A., as successor in interest to Barep; SG AM AI Premium Fund L.P. (f/k/a SG AM Alternative Diversified U.S. L.P.) (“SG Premium”); Lyxor Asset Management Inc. (f/k/a SGAM Asset Management, Inc.), as general partner of SG Premium; SG Audace Alternatif (f/k/a SGAM AI Audace Alternatif); SGAM AI Equilibrium Fund (f/k/a

SGAM Alternative Diversified Fund); Lyxor Premium Fund (*f/k/a* SGAM Alternative Diversified Premium Fund) (“Lyxor Premium”); Societe Generale S.A., as trustee for Lyxor Premium; and Societe Generale Bank & Trust S.A. (collectively, the “Stipulating Defendants”) must move, answer or otherwise respond to the complaint (the “Complaint”) filed in this adversary proceeding is extended up to and including November 5, 2014. The pre-trial conference previously scheduled for October 22, 2014 will be adjourned to January 28, 2015 at 10:00 a.m.

The purpose of this stipulated extension is to provide additional time for the Stipulating Defendants to answer, move against, or otherwise respond to the Complaint. Nothing in this stipulation is a waiver of the Stipulating Defendants’ right to request from the Court a further extension of time to answer, move or otherwise respond and/or the Trustee’s right to object to any such request.

Undersigned counsel for the Stipulating Defendants hereby waives any defenses based on insufficiency of process or insufficiency of service of process of the Second Summons and Complaint on behalf of the Stipulating Defendants.

Undersigned counsel for the Stipulating Defendants waives and expressly represents that they shall not raise any argument or objection that a request by the Trustee under the Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil or Commercial Matters for the identity of the beneficial owner(s) of any account that received transfers from the redemption of shares referenced in the Complaint (the “Hague Request”) is premature. Except as expressly set forth herein, the parties to this Stipulation reserve all other rights and defenses they may have, including without limitation with respect to the Hague Request, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

Except as expressly set forth above, the parties to this stipulation reserve all rights and defenses they may have, and entry into this stipulation shall not impair or otherwise affect such rights and defenses, including without limitation any defenses based on lack of jurisdiction.

This stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic or electronic copy of this stipulation shall be deemed an original. This stipulation is entered into pursuant to the Order Granting Supplemental Authority To Stipulate To Extensions Of Time To Respond And Adjourn Pre-Trial Conferences (ECF No. 7037) in the main case (No. 08-01789 (SMB)).

Dated: New York, New York
August 14, 2014

By: /s/ Antonio J. Casas
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*Special Counsel to Irving H. Picard, Trustee for
the Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC and
Bernard L. Madoff*

Dated: New York, New York
August 14, 2014

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